

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

INTERNATIONAL FINANCE CORPORATION,
not in its individual capacity, but solely as the
Trustee for the IFC-Netherlands Carbon Facility,

Plaintiff,

V.

KORAT WASTE TO ENERGY CO. LTD.
(a/k/a Khorat Waste to Energy Co.),

Defendant.

07 Civ. 5451 (SHS)

**KWTE'S NOTICE OF MOTION TO
VACATE DEFAULT AND TO FILE ITS ANSWER OUT-OF-TIME
AND OPPOSITION TO MOTION FOR DEFAULT JUDGMENT**

PLEASE TAKE NOTICE that Defendant Korat Waste to Energy Co. Ltd. (“KWTE”), by and through its attorneys, Wallace King Domike & Reiskin, PLLC, and Morvillo, Abramowitz, Grand, Iason, Anello & Bohrer, P.C., will move this Court on a date and time to be determined at the Courthouse located at 500 Pearl Street, New York, New York 10007, for an order pursuant to Rule 55(c) of the Federal Rules of Civil Procedure to set aside the default entered on April 14, 2008 and to allow KWTE to file its answer out-of-time.

The accompanying memorandum is also submitted in opposition to Plaintiff International Finance Corporation's Motion for Default Judgment.

Respectfully submitted,

April 15, 2008

/s/

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